

Roopal P. Luhana  
**CHAFFIN LUHANA LLP**  
 600 Third Avenue, Floor 12  
 New York, NY 10016  
 Telephone: (888) 480-1123  
 luhana@chaffinluhana.com

Sarah R. London (SBN 267083)  
**GIRARD SHARP LLP**  
 601 California St., Suite 1400  
 San Francisco, CA 94108  
 Telephone: (415) 981-4800  
 slondon@girardsharp.com

Rachel B. Abrams (SBN 209316)  
**PEIFFER WOLF CARR KANE  
 CONWAY & WISE, LLP**  
 555 Montgomery Street, Suite 820  
 San Francisco, CA 94111  
 Telephone: (415) 426-5641  
 rabrams@peifferwolf.com

*Co-Lead Counsel for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.,  
 PASSENGER SEXUAL ASSAULT  
 LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

This Document Relates to:

STIPULATION AND [PROPOSED] ORDER  
 TO RESET DEADLINES RE: PTO NO. 26  
 AND EXPERT DEMONSTRATIVES

*WHB 1486 V. Uber Technologies, Inc., et al.,*  
 Case No. 24-cv-4803;

*A.R.2 v. Uber Technologies, Inc., et al.,*  
 Case No. 3:24-cv-07821;

*Dean v. Uber Technologies, Inc., et al.,*  
 Case No. 23-cv-6708;

Judge: Hon. Charles R. Breyer  
 Courtroom: Courtroom 6-17<sup>th</sup> Floor

*B.L. v. Uber Technologies, Inc., et al.,*  
 Case No. 2f-cv-7940;

*LCHB128 v. Uber Technologies, Inc., et al.,*  
 Case No. 24-cv-7019; and

*WHB 1876 v. Uber Technologies, Inc., et al.*  
 Case No. 24-cv-5230.

STIPULATION TO RESET DEADLINES AND  
 EXPERT DEMONSTRATIVES

1 WHEREAS, on May 1, 2025, the Court issued Pretrial Order No. 26: Bellwether Trial Wave 1  
2 Case Assignments and Discovery Schedule;

3 WHEREAS, Pretrial Order No. 26, which required the parties to exchange expert reports by  
4 August 8, 2025 and rebuttal expert reports by September 8, 2025, was modified by Stipulation and  
5 Court Order to require the parties to submit expert reports by August 22, 2025, and rebuttal expert  
6 reports by September 22, 2025 [ECF 3533];

7 WHEREAS, the parties agree certain fact discovery remains open for completion -- including  
8 a 30(b)(6) deposition on August 21, 2025 that is necessary for expert discovery;

9 WHEREAS, the parties agree that expert deadlines should be modified such that the  
10 exchange of expert reports should move from August 22, 2025 to August 29, 2025, and the  
11 exchange of rebuttal expert reports should move from September 15, 2025 to September 29, 2025;

12 WHEREAS, the parties agree that extending the aforementioned deadlines will not require  
13 extending any other deadlines set by Pretrial Order No. 26.

14 WHEREAS, the Court's Standing Order on Civil Jury Trials Section II(F)(1) regarding Expert  
15 Witnesses provides, in relevant part: "expert reports must be complete and sufficiently detailed.  
16 Illustrative animations, diagrams, charts and models may be used on direct examination only if they  
17 were part to the expert's report... By written stipulation, of course, all sides may relax these  
18 requirements."

19 WHEREAS, on June 3, 2025, the Parties indicated their intent to provide a stipulation  
20 relaxing these requirements to the Court. ECF 3157.

21 THEREFORE, the parties respectfully request the Court enter the parties' stipulation and  
22 that the following deadlines set by Pretrial Order No. 26 and modified by ECF 3533 be extended as  
23 follows:

- 24 • The parties shall exchange expert reports by August 29, 2025.
- 25 • The parties shall exchange expert rebuttal reports by September 29, 2025.

1 IT IS HEREBY STIPULATED AND AGREED by the Parties that expert reports need not  
2 include “[i]llustrative animations, diagrams, charts and models” for them to be used on direct  
3 examination.

4  
5 **IT IS SO STIPUALTED.**

6  
7 DATED: August 14, 2025

Respectfully submitted,

8 By: /s/ Sarah London

9 RACHEL B. ABRAMS (Cal Bar No. 209316)

ADAM B. WOLF (Cal Bar No. 215914)

10 SARA B. CRAIG (Cal Bar No. 301290)

PEIFFER WOLF CARR KANE CONWAY  
& WISE, LLP

11 555 Montgomery Street, Suite 820

San Francisco, CA 94111

12 Telephone: 415.766.3544

Facsimile: 415.840.9435

13 Email: rabrams@peifferwolf.com

awolf@peifferwolf.com

14 scraig@peifferwolf.com

15 ROOPAL P. LUHANA (*Pro Hac Vice*)

CHAFFIN LUHANA LLP

16 600 Third Avenue, Fl. 12

17 New York, NY 10016

Telephone: (888) 480-1123

18 Email: luhana@chaffinluhana.com

19 SARAH R. LONDON (SBN 267083)

20 ANDREW R. KAUFMAN (*Pro Hac Vice*)

GIRARD SHARP LLP

21 601 California St., Suite 1400

San Francisco, CA 94108

22 Telephone: (415) 981-4800

23 Email: slondon@girardsharp.com

akaufman@girardsharp.com

24 *Co-Lead Counsel for Plaintiffs*

1 Dated: August 14, 2025

KIRKLAND & ELLIS LLP

2 /s/ Laura Vartain Horn

3 Jessica Davidson (*Admitted Pro Hac Vice*)

4 jessica.davidson@kirkland.com

601 Lexington Avenue New York, NY 10022

5 Telephone: (212) 446-4800

6 Allison M. Brown (*Admitted Pro Hac Vice*)

7 alli.brown@kirkland.com

2005 Market Street, Suite 1000

8 Philadelphia, PA 19103

9 Telephone: (215) 268-5000

10 Laura Vartain Horn (SBN 258485)

11 laura.vartain@kirkland.com

555 California Street

12 San Francisco, CA 94104

Telephone: (415) 439-1400

13 *Attorneys for Defendants*

14 UBER TECHNOLOGIES, INC.,

RASIER, LLC, and RASIER-CA, LLC

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: August 14, 2025

/s/ Sarah R. London

SARAH R. LONDON

**[PROPOSED] ORDER**

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Charles R. Breyer  
United States District Judge